IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

DONALD FRANCIS KELLY, II

Debtor : CASE NO. 1:13-bk-04693

:

DEUTSCHE BANK NATIONAL TRUST:
COMPANY, AS TRUSTEE FOR:
MORGAN STANLEY IXIS REAL:
ESTATE CAPITAL TRUST 2006-2:
MORTGAGE PASS THROUGH:
CERTIFICATES, SERIES 2006-2:

Movant

:

v. : DONALD FRANCIS KELLY, II :

Respondent :

ANSWER TO MOTION FOR RELIEF FROM STAY

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. This paragraph paraphrase portions of document, which are attached to as exhibits to the Motion and which speak for themselves; to the extent that this paraphrase conflicts with the actual wording or meaning of the documents, it is denied.
- 5. Admitted.
- 6. Admitted that the debtor had fallen behind; however, he anticipates curing the arrearages through an amended plan or stipulation.
- 7. Admitted that the amount is approximately correct.
- 8. Denied. The trustee's website shows that he owes \$196.13.
- 9. The Debtor lacks knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same.
- 10. This paragraph is a conclusion of law to which no answer is necessary; to the extent that an answer is deemed necessary, it is denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron

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